

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION - BOSTON)

<p>KIRA WAHLSTROM,</p> <p>Plaintiff,</p> <p>-against-</p> <p>DAVID J. HOEY, LAW OFFICES OF DAVID J. HOEY, P.C., DON C. KEENAN, D.C. KEENAN & ASSOCIATES, P.C. D/B/A THE KEENAN LAW FIRM, P.C., AND KEENAN'S KIDS FOUNDATION, INC.</p> <p>Defendants</p>	<p>Civil Case No. 1:22-cv-10792-RGS</p>
---	---

**PLAINTIFF'S MOTION FOR ORDER ALLOWING ALTERNATIVE SERVICE ON
DEFENDANTS DON C. KEENAN and D.C. KEENAN & ASSOCIATES, P.C. D/B/A THE
KEENAN LAW FIRM P.C. VIA SERVICE ON COUNSEL**

Plaintiff Kira Wahlstrom, through undersigned counsel, respectfully moves this Court to allow alternative service of Defendants Don C. Keenan, an individual, and of D.C. Keenan & Associates, P.C. D/B/A The Keenan Law Firm, P.C., organized in Florida and operating from Georgia by serving counsel retained to represent these parties in this action. As shown in the accompanying Memorandum in support of this motion, Ms. Wahlstrom has made sufficiently diligent efforts to serve Keenan and his law office in both Georgia and Florida and Defendant Keenan has further refused to authorize his counsel retained for this action to accept service, in an attempt to evade service, warranting the relief sought by this motion.

Pursuant to L.R. 7-1(a)(2), undersigned counsel certifies that she attempted to resolve this matter in good faith by conferring with counsel for Keenan, attorney John O'Connor, but was

unable to reach a resolution. Those efforts are further detailed in the attached memorandum and declaration with exhibits submitted in support of this motion.

Dated: August 2, 2022

Respectfully submitted,

/s/ Bridget A. Zerner

Bridget A. Zerner (BBO No. 669468)

John J.E. Markham, II (BBO No. 638579)

MARKHAM READ ZERNER LLC

One Commercial Wharf West

Boston, Massachusetts 02110

Tel: (617) 523-6329

Fax: (617) 742-8604

bzerner@markhamreadzerner.com

jmarkham@markhamreadzerner.com

Attorneys for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2022 this document was served by electronic delivery through the CM/ECF system on the registered participants as identified on the Notice of Electronic Filing, which will forward copies to Counsel of Record.

Additionally, I provided a copy of the foregoing document to attorney John O'Connor of Peabody Arnold LLP who has informed undersigned that he is representing Defendant Don Keenan and Defendant Keenan Law in this matter though he has not been authorized to accept service on behalf of Keenan and Keenan Law and has not yet filed an appearance.

/s/ Bridget A. Zerner

Bridget A. Zerner